

Before the
Federal Communications Commission
Washington, D. C. 20554

In the Matter of)

Allocation of Spectrum Below)
5 GHz Transferred from)
Federal Government Use)

ET Docket NO. 94-32

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JUN 14 1994

To: The Commission

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COMMENTS OF THE COUNTY OF ORANGE, CALIFORNIA

The County of Orange, California, supports the allocation of spectrum below 5 GHz from Federal use to private sector use, and respectfully submits comments on the above captioned matter.

1. The County of Orange, California (County), is located between Los Angeles County and San Diego County along the Pacific Ocean, geographically being part of the "Los Angeles basin," comprises 768 square miles with a population of over 2,500,000 permanent residents and a very large transient population, with its many business and industrial activities, beaches and recreational areas, Disneyland, Knott's Berry Farm, Anaheim Stadium (home of the California Angels and Los Angeles Rams), Anaheim Arena or "Pond" (home of the Anaheim Mighty Ducks), and major convention centers, including those in Anaheim and at the Disneyland Hotel.
2. Orange County currently operates its joint City-County Coordinated Public Safety Communications Systems, having done so since 1934. These operations range in frequency throughout the 30 to 900 MHz frequency bands, with a current project to bring virtually all of these local governmental activities to the 800 MHz band to enhance interoperability among the County's departments and agencies, incorporated cities, and special districts, for both day-to-day and disaster-related activities such as the recent Laguna Beach fire.
3. The County is aware of the developing communications technologies, can foresee their application to the Public Safety activities within Orange County, and can also foresee the need for additional, appropriate spectrum to implement these new technologies. With the increasing strain on funding, both nationally and locally, the increased use of "workable" and "affordable" technology is an absolute necessity.

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4. The spectrum allocations made in support of emerging technologies all appear to be directed towards common carrier services, with essentially no availability of spectrum for private systems development such as for Public Safety use. This has caused a deep concern to the County, as the County believes that it requires its own dedicated spectrum which it can control and prioritize the use of, and can direct and prioritize the restoration of, in times of disaster and/or emergency. The County also believes that it must often provide its Public Safety communications capabilities into remote and/or lightly-populated areas not adequately serviced by common carrier systems.

Southern California is a wonderful area, but is plagued with threats of natural and man-made disasters, including civil disorder, earthquakes, fires, floods, etc., which make effective, efficient, and reliable Public Safety communications imperative. Even for day-to-day Public Safety operations, additional spectrum resources will be required to support the current and near-future technologies such as the FBI's NCIC 2000 and the delivery of video signals from patrol vehicles.

5. The specific allocations proposed do not appear to be appropriate or usable for wide-area use by the Public Safety community at large, nor for the County itself. The proposed band allocations at 2390-2400 and 2402-2417 MHz are believed to be too close to the Industrial, Scientific and Medical (ISM) allocation at (and about) 2450 MHz, and the County is concerned that severe interference will be experienced by vital low power operations for the new services, which would be especially devastating to critical Public Safety communications. The proposed band allocation at 4660-4685 MHz appears to be well beyond the capabilities for current technology to effectively utilize these frequencies for the wide-area type of communications services required by Public Safety agencies, and it is not known how long the development process for such service at these frequencies will require.
6. The County's views appear to be consistent with those expressed by the Coalition of Private Users of Emerging Multimedia Technologies (C.O.P.E.) in its Petition for Rule Making. Therefore, the County hereby supports that petition.
7. In conclusion, the County believes that a spectrum allocation for Advanced Private Land Mobile Communications Services is necessary and would greatly enhance the development of emerging multimedia technologies that will be utilized by the Public Safety community at large. It is also believed that the C.O.P.E. petition accurately outlines the overall need for this spectrum and the advantages to the Private Radio community at large.

The County urges the Commission and NTIA to allocate appropriate and usable spectrum sufficient to accommodate Advanced Private Land Mobile Communications Services, specifically considering the Public Safety needs of state and local governmental agencies.

Respectfully submitted by:



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June 10, 1994